

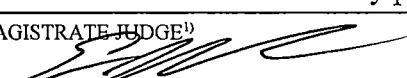


## CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
<b>United States of America</b> <b>v.</b> <b>Raul Insterberto ZAMUDIO Jr.</b> DOB: xx/xx/1993 United States Citizen	DOCKET NO.
	MAGISTRATE'S CASE NO. <b>19-00203 MJ</b>
Complaint for violation of Title 18 United States Code § 554(a)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:	
<p>On or about March 26, 2019, at or near Tucson, and elsewhere within the District of Arizona, Raul Insterberto ZAMUDIO knowingly exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, to wit: four Walther model Colt Government .22 caliber pistols, one Kel-Tec model PMR 30 .22 caliber pistol, one Glock model 19X 9mm pistol, one Beretta model M9 .22 caliber pistol, one Diamondback model AR15 multi-caliber rifle, and one Smith &amp; Wesson model MP15-22 .22 caliber rifle, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).</p>	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
<p>On March 26, 2019, Raul Insterberto ZAMUDIO was stopped by Bureau of Indian Affairs (BIA) officers for a traffic violation while on Interstate 19 south of Tucson, Arizona, near Papago Road. During the vehicle stop, ZAMUDIO told the officers he was travelling from Las Vegas, Nevada, to Nogales, Sonora, Mexico, to visit family. He gave the officers consent to search the vehicle. Nine firearms were located wrapped in packaging and electrical tape in a shopping bag immediately behind the driver's seat, and were later identified as: four Walther model Colt Government .22 caliber pistols, serial numbers WD043440, WD043408, WD043483, WD043442; one Kel-Tec model PMR 30 .22 caliber pistol, serial number WX3K49; one Glock model 19X 9mm pistol, serial number BKHK495; one Beretta model M9 .22 caliber pistol, serial number BM023683; one Diamondback model AR15 multi-caliber rifle, serial number DB1575583; and one Smith &amp; Wesson model MP15-22 .22 caliber rifle, serial number DER5935. ZAMUDIO was cited by the BIA officers for the traffic violation. During a post-Miranda interview, ZAMUDIO admitted that he intended to smuggle the firearms to Mexico and that he had done so on one other occasion. ZAMUDIO admitted that he, his cousin, and his cousin's husband purchased all nine of the firearms in Las Vegas, Nevada, with the knowledge that the weapons were going to be smuggled to Mexico. ZAMUDIO admitted that he has no export license and that he knew that smuggling firearms from the United States into Mexico was illegal.</p>	
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED	SIGNATURE OF COMPLAINANT
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	 OFFICIAL TITLE ATF Special Agent
REVIEWED by AUSA Angela W. Woodridge 	
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE 	DATE March 27, 2019